



**MARYLAND DEPARTMENT OF THE ENVIRONMENT
WATER QUALITY REVOLVING LOAN FUND PROGRAM**

**DRAFT
FEDERAL FISCAL YEAR 2014
INTENDED USE PLAN**

MAY 16, 2014



Prepared By

MARYLAND WATER QUALITY FINANCING ADMINISTRATION

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MARYLAND DEPARTMENT OF THE ENVIRONMENT
MARYLAND WATER QUALITY FINANCING ADMINISTRATION

DRAFT

**Federal Fiscal Year 2014 Intended Use Plan
Maryland Water Quality Revolving Loan Fund**

TABLE OF CONTENTS

Executive Summary	1
A. Sources and Uses of Funds	3
B. Goals of the Maryland Water Quality Revolving Loan Fund (WQRLF or WQSRF)	4
C. Project Selection and Fund Activities under the FFY 2014 Intended Use Plan (IUP)	6
D. Project Scope of Work/Environmental Benefits - FFY 2014 IUP Projects	7
E. Minority Business Enterprises/Women's Business Enterprises (M/WBE) Participation.....	8
F. Assurances	8
G. Binding Commitments/Federal Payments	8
H. Public Review of the Draft FFY 2014 IUP	8

Table 1 - Project Funding List and Sources/Uses of Funds

Appendix A:	Reserved for Maryland WQSRF Draft Project Priority List for FFY 2014 IUP
Appendix B:	Reserved for WQSRF Integrated Project Priority System (IPPS)
Appendix C:	Reserved for Public Hearing Responsiveness Summary
Appendix D:	Reserved for Assistant Attorney General Certification

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MARYLAND WATER QUALITY FINANCING ADMINISTRATION
DRAFT
Federal Fiscal Year 2014 Intended Use Plan
Maryland Water Quality Revolving Loan Fund**

EXECUTIVE SUMMARY

The Intended Use Plan (IUP) is the document that the Maryland Water Quality Financing Administration (MWQFA) will submit to the United States Environmental Protection Agency (USEPA) to request the Federal Fiscal Year (FFY) 2014 Capitalization Grant under the Federal Clean Water Act (CWA), to be matched with 20% of State bond/general funds, for use in the Maryland Water Quality Revolving Loan Fund (WQRLF or WQSRF). The Maryland WQSRF was established pursuant to the Clean Water Act of 1987 and the Maryland Water Quality Financing Administration Act, Title 9, Subtitle 16 of the Environment Article, Annotated Code of Maryland, to provide below market interest rate loans and other subsidies to local governments and eligible private entities for certain water quality capital projects.

The State of Maryland is committed to using the capitalization grant funds ("cap grant") for which we are applying to provide funding for water quality improvements from point and nonpoint source capital projects, including eligible "green" projects that will further the water quality and public health objectives of the CWA.

During FFY 2014, Maryland will be making a grant application to receive \$33,910,000 in Federal Capitalization Grant to be matched with \$6,782,000 (20%) in State funds. With this FFY 2014 IUP, the MWQFA is requesting the federal (4%) funds or \$1,356,400 for WQSRF program administration. The highlights of the FFY 2014 IUP are as follows:

SOURCES		USES	
Capitalization Grant	\$ 33,910,000	WQSRF Admin. Exp. (up to 4% of grant)	\$ 1,356,400
State (Bond/Gen. Fund) Match (20%)	\$ 6,782,000	Capital Projects - Loans & Grants	\$ 130,000,000
Est. Invest. Earnings/Repayments	\$ 90,664,400	Linked Deposit Program Bank Loans	\$ -
Total	\$ 131,356,400		\$ 131,356,400

The FFY 2014 federal appropriation act allows WQSRF to provide additional subsidies (e.g., loan principal forgiveness, grants), for which the statutory maximum amount is \$2,767,954. MWQFA will provide these subsidies to disadvantaged communities, which are discussed later in this IUP. The FFY 2014 federal appropriation act also requires no less than \$3,391,000 (10% of the cap grant) be allocated to "green" projects provided sufficient applications were received. Sufficient applications for loans were not received to meet the "green" project goal.

Loan Terms: Applicable to all WQSRF loans except loans through the Linked Deposit Program
(See Section B-2 below)

Current Interest Rate* Standard Rate = 50% of Market Rate
Disadvantaged Community (DAC) Rate = 25% of Market
(Market Interest Rate is defined as the average of the Bond Buyer 11-Bond Index for the month preceding the loan closing).

* MDE, by policy, can change the SRF loan interest rate at any time. Interest rates are updated monthly and are posted on the MWQFA web site.

Loan Term Up to 20 Years

Loan Origination Fee None

Administrative Fee 5% of the aggregate debt service divided by the number of administrative fee payments over the life of the loan, collected annually. This amounts to approximately a 0.50% (or 50 basis points) increase in the interest rate for a 20-year loan. The administrative fee is used to cover program operating expenses. This is in addition to any funds provided for WQSRF program expenses from the Federal funds (up to 4% of cap grant).

Table 1 shows the proposed list of projects for inclusion on the FFY 2014 IUP for WQSRF financial assistance. These projects were selected from the Project Priority List based on: (1) the Integrated Project Priority System (IPPS) ranking and (2) readiness to proceed to construction no later than December 31, 2015. The IPPS was revised and approved by the USEPA in November 2010. The IPPS provides higher priority to compliance, public health, and nutrient reduction projects located in areas with the greatest relative effectiveness and benefit to the Chesapeake Bay. The new priority system provides additional points for projects that are advancing sustainable efforts in upgrading/fixing existing infrastructure including full cost pricing, asset management and water/energy efficiency. Projects that are not consistent with Maryland's Smart Growth/Priority Funding Area (PFA) legislation will need a PFA exception approval prior to loan execution. Before loan execution, projects identified in the IUP will undergo a financial credit capacity analysis by the MWQFA.

Table 1 shows projects that are being considered for loans and additional subsidies (loan principal forgiveness or grants, if disadvantaged) based on the federal statutory limitation.

**MARYLAND DEPARTMENT OF THE ENVIRONMENT
MARYLAND WATER QUALITY FINANCING ADMINISTRATION
Federal Fiscal Year 2014 Intended Use Plan
Maryland Water Quality Revolving Loan Fund**

A. Sources and Uses of Funds

A comprehensive summary of WQSRF Sources and Uses of funds are as follows:

Sources:			Thru 2013 IUP		2014 IUP (\$ Million)
Federal Capitalization Grants			\$ 803,289,946	a	\$ 33,910,000
Federal Stimulus Grants 08 IUP (ARRA)			\$ 94,784,600		
State Match Appropriated			\$ 160,671,000	b	\$ 6,782,000
Total Revenue Bond Proceeds			\$ 236,222,390		\$ -
Investment Earnings (Thru SFY 13)			\$ 149,242,654		
Loan Principal Repayments (Thru SFY 13)			\$ 704,457,096		
Loan Interest Repayments (Thru SFY 13)			\$ 217,088,330		
		Subtotal	\$ 2,365,756,016		\$ 40,692,000
Estimated Loan Principal (SFY 14)			\$ 53,623,829		\$ 11,376,171
Estimated Loan Interest Repayments (SFY 14)					\$ 9,000,000
Investment Earnings (SFY 14)					\$ 4,000,000
Estimated Loan Principal (SFY 15)					\$ 67,000,000
Estimated Loan Interest Repayments (SFY 15)					\$ 8,000,000
Investment Earnings (SFY 15)					\$ 4,000,000
		Subtotal	\$ 53,623,829		\$ 103,376,171
		Total Sources	\$ 2,419,379,845		\$ 144,068,171
Uses:					
Loan Agreements Entered as of 6/30/13			\$ 1,771,088,432		\$ -
Projects on IUPs with loans pending			\$ 167,000,000		\$ 130,000,000
Loan executed FY 2014 as of 5/15/2014			\$ 99,000,000		\$ -
Funds Transferred to Drinking Water SRF (98/99 IUPs)			\$ 10,634,580		\$ -
Bond Principal Repaid			\$ 189,022,390		\$ 10,530,000
Bond Interest Expense			\$ 129,662,497		\$ 2,100,000
Bond Cost of Issuance/Underwriter Discount			\$ 4,949,910		\$ -
Bond Debt Service Reserve			\$ 3,276,900	c	\$ -
Stimulus Administrative Expense			\$ 2,000,000		\$ -
4% Administrative Expensed as of 6/30/13			\$ 16,840,703		\$ -
4% Administrative Expense/Reserve			\$ 2,904,433		\$ 1,356,400
Allocated Non-point Source Projects (Linked Deposit)			\$ 23,000,000		\$ -
		Total Uses	\$ 2,419,379,845		\$ 143,986,400
The above does not include program income generated from loan fees, used for administrative expenses.					

^a Total awards through FFY 2013 Capitalization Grant, excluding ARRA

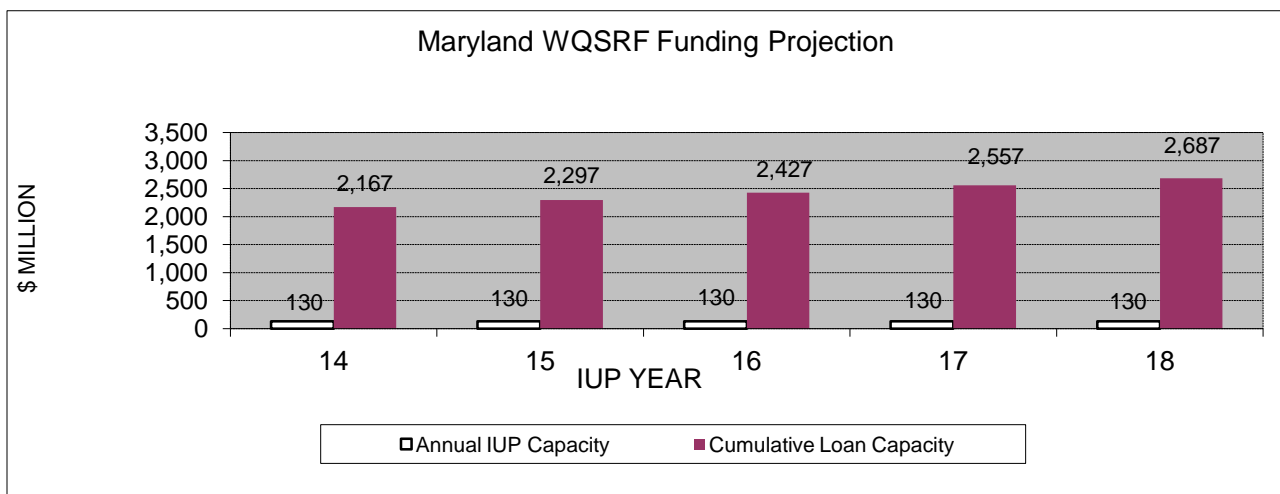
^b Includes State General/Bond Fund match of \$6.459 million for FFY 2013 IUP (available July 1, 2014)

^c Debt Service Reserve as of September 1, 2013.

B. Goals of the Maryland Water Quality Revolving Loan Fund

1. Long-Term Goals

- **Fund Perpetuity & Utilization** - To utilize the total financial resources of the Fund by providing low interest rate financing while maintaining a perpetual source of capital funds for future water quality projects. The goal is to achieve a fund utilization rate (loans executed/total funds available) of 90% or greater. This is a Program Activity Measure (PAM) under EPA's strategic plan for the WQSRF. For FFY 2014, MWQFA is projecting WQSRF fund utilization rate of 95%. The WQSRF could finance approximately \$650 million in additional loans from capitalization grants, State match, loan repayments, and investment earnings between FFY 2014 and FFY 2018 IUPs (see graph below). This is in addition to the \$2.01 billion capacity on existing IUPs (FFY1989 - 2013). This analysis takes into account stimulus funds, existing and anticipated investment earnings, loan repayments and assumes Maryland's share of future Federal Capitalization Grant of a minimum \$32 million per year. The cumulative loan/grant financing capacity of the WQSRF is projected to be over \$2.68 billion by FFY 2018.



- **Funding Prioritization** – The updated IPPS rating and ranking system targets financial assistance to projects that help meet the Maryland's Final Watershed Implementation Plan (WIP) to address the Chesapeake Bay Total Daily Maximum Daily Load (TMDL). The IPPS focuses on the proposed project water quality benefits or documented public health concerns, relative effectiveness of nutrient reduction to the Chesapeake Bay, compliance status, cost efficiency and sustainability elements.
- **Reasonable User and Project Unit Cost** - To ensure facilities are constructed and maintained at a reasonable cost for the users of the system. To this end, MWQFA will continue to provide disadvantaged communities (DACs) a lower interest rate and additional subsidies such as partial loan forgiveness or grant. For projects that have high unit cost per household, the MWQFA will continue to coordinate its State grant programs with other Federal/State financial assistance programs (e.g., USDA Rural Utilities Service, Community Development Block Grant, Federal Special Appropriation grants) that provide approximately \$15 million/year for water/sewerage system improvements in Maryland.
- **Financial Capacity & Disadvantaged Community Assistance** - As part of the credit/financial analysis of potential borrowers, the MWQFA will continue to provide financial advisory services to system owners on the feasibility of their user rate structure and financial capacity to pay back a loan. The MWQFA financial model forecasts future operating cash flows based on existing/proposed user rates using audited financial statements. The model has been an effective tool to assist communities in developing affordable user rate structures and in determining additional subsidies to DACs.

2. Short-Term Goals/FFY2014 IUP Operating Goals

- Finance Advanced Treatment at WWTPs for Nutrient Reduction - To provide low-cost financing to local governments for the local share, in tandem with the Maryland's Bay Restoration Grant Fund for Enhanced Nutrient Removal (ENR), to upgrade targeted wastewater treatment facilities with advanced treatment to reduce nitrogen and phosphorus discharges as part of the Maryland's WIP. Maryland's far-reaching legislation (Bay Restoration Fund), which was signed into law in 2004 (amended in 2012 to increase the fee from \$2.50/month per equivalent dwelling to \$5.00) to address Bay restoration, created a dedicated fund to initially upgrade the 67 largest wastewater treatment plants to ENR standards. ENR upgrades at Maryland's largest 67 wastewater treatment plants are expected to reduce 7.5 million pounds of nitrogen and 260,000 pounds of phosphorus from entering into the Bay each year, which is required for Maryland to meet its load cap under the Chesapeake Bay TMDL. ENR projects are expected to receive up to 100% state grants for ENR eligible components. Some non-eligible ENR components can be covered by WQSRF loans. See Table 1 for ENR projects identified for funding in the FFY 2014 IUP.
- Community & Utility Sustainability - To provide low-cost capital financing to local governments for existing facility (fix-it-first) upgrades for water quality improvements necessary to achieve or maintain permit compliance. The FFY 2014 IUP funding list identifies several such projects. In addition, MWQFA continues to work closely with facility owners to maintain system financial capacity. MWQFA's credit capacity analysis includes detailed discussions with potential loan recipients to ensure that their sewerage enterprise fund remains fiscally solvent. Fiscal solvency includes reliable and dedicated sources of revenue for the debt service on capital improvements and the cost of operations and maintenance. Applicants that have full-cost pricing (revenue generated for replacement cost/depreciation recovery) in their sewer user rates are awarded sustainability points on the project rating system. Similarly, projects with growth that support community sustainability such as proximity to transit, brownfield revitalization, community legacy areas, decentralized sewage systems or projects that support green infrastructure (effluent or digester gas reuse etc.), energy efficiency and environmental innovation are awarded sustainability points on the project rating system.
- Green Infrastructure, Water and Energy Efficiency and Environmental Innovation Projects - The MWQFA has actively solicited "green" projects to be included in the FFY 2014 IUP for funding to help restore Maryland's waterways as part of the larger Chesapeake Bay restoration goals. Green projects are integral to the innovative approach Maryland has taken through the Chesapeake Bay WIP to address water quality issues throughout the Maryland portion of the Bay watershed. Only three projects are interested in green loans totaling \$316,300, which are being offered priority for loan funding. Based on the above, the FFY 2014 IUP currently has only 1% of the federal amount allocated towards green projects. The MWQFA may amend in projects from prior year IUPs (that have met the IUP "green % goals" and have excess capacity) and have not executed a loan agreement.
- Additional Subsidization and Eligible Recipients - The FFY 2014 federal appropriation act allows WQSRF to provide additional subsidies (e.g., loan principal forgiveness, grants), not to exceed the statutory maximum amount of **\$2,767,954**. Additional subsidies are provided to DAC applicants in priority ranking order and readiness to proceed to construction, until the statutory limit is reached. DACs are eligible to receive up to 50% of the WQSRF financing as grant or loan principal forgiveness, not to exceed \$1.5 million per project and/or applicant. The DAC eligibility criteria is as follows:
 1. Sewer user rate per year per Equivalent Dwelling Unit (EDU) > 1% of Community Median Household Income (MHI); or
 2. Project is physically located and benefits an MDE approved Environmental Benefit District; or
 3. Project is physically located and benefits a community with MHI less than 70% of State MHI

In addition to above criteria, if the statutory limit for additional subsidy has not been reached, up to 25% of the loan amount as loan-forgiveness not to exceed \$1.5 million, may also be provided to projects in priority ranking order with readiness to proceed, where the sewer user rate would increase by more than 20% to achieve financial capacity as determined by MDE. Note: No project on the Draft FFY 2014 IUP is identified for additional subsidy under this section.

- Finance Non-Point Source (NPS) Projects – Linked Deposit (LD) - Continue funding Privately Owned Non-point Source Projects using the LD Program. Since most private entities do not receive a formal mail

solicitation to apply for WQSRF loans as local governments do, information regarding the WQSRF LD Program is provided through a cooperative effort between Department of Natural Resources, Department of Agriculture, Local Soil Conservation Districts, Local Health Departments, and Maryland Department of the Environment (MDE). Information on the LD Program is also available on the MWQFA website. The MWQFA has previously allocated \$23 million of recycled funds (investment earnings/repayments) for eligible private NPS projects to be funded on a first come first served basis using the LD Program. Based on low demand, MWQFA is not requesting new funds for Linked Deposit activity with the FFY 2014 IUP.

For additional information on the LD program see web link: <http://www.mde.state.md.us/wqfa>

C. Project Selection and Fund Activities under the FFY 2014 IUP

Financial Assistance Applications for water quality projects were solicited by the MWQFA in December 2013 through January 2014 to develop the Maryland Project Priority List (PPL). Project applications were rated and ranked based on the Clean Water Integrated Project Priority Rating/Ranking Criteria (IPPS) and identified in the Maryland PPL for Federal FY 2014 and State FY 2016 Clean Water Funds. This PPL was used to select projects for the FFY 2014 IUP, based on their priority ranking, applicant's interest in CWSRF loan, and readiness to proceed to construction by December 2015 (unless specifically requesting a planning/design phase loan).

The capital project funding in the FFY 2014 IUP is \$130,000,000. Below is a summary of the sources and uses for funds.

SOURCES		USES	
Capitalization Grant	\$ 33,910,000	WQSRF Admin. Exp. (up to 4% of grant)	\$ 1,356,400
State (Bond/Gen. Fund) Match (20%)	\$ 6,782,000	Capital Projects - Loans & Grants	\$ 130,000,000
Est. Invest. Earnings/Repayments	\$ 90,664,400	Linked Deposit Program Bank Loans	\$ -
Total	\$ 131,356,400		\$ 131,356,400

All projects identified on the FFY 2014 IUP Table 1 for WQSRF financing are being considered for both below market interest rate loan and grant/loan forgiveness funding, provided they are ready-to-proceed to construction by December 31, 2015.

If an Applicant with a project identified on the Project Priority List that is not being considered for WQSRF funding on Table 1 wishes to pursue a "LOAN", they should contact Ms. Elaine Dietz by email at elaine.dietz@maryland.gov or by phone at 410-537-3908. Funding capacity for these projects, if selected, will come from projects on the older IUPs that are delayed/deleted, from future loan repayments and/or issuance of additional revenue bonds, if necessary.

Subsidies for Disadvantaged Communities: The FFY 2014 appropriation act allows WQSRF to provide additional subsidies (e.g., loan principal forgiveness, grants), not to exceed the statutory maximum amount of **\$2,767,954**. Sufficient applications were received to use up this full allocation. Additional subsidies are provided to DAC applicants in priority ranking order and readiness to proceed to construction, until the statutory limit is reached.

Administrative Expenses: Below is a summary of the budget for use of the 4% of Capitalization grant that may be utilized for WQSRF administrative expenses:

Indirect Costs

Item	Est. \$ Amount	% of Total	Notes
Salary and Fringe	\$ 1,050,000	77.41%	Note 1 Note 2
Indirect Overhead (27.05%)	\$ 284,025	20.94%	
Contractor Services	\$ -	0.00%	
Travel/Training	\$ 15,000	1.11%	
Office Supplies	\$ 7,375	0.54%	
Total	\$ 1,356,400	100.00%	

Note 1: Details of the travel and training costs of \$15,000 are as follows:

- 3 staff @ \$2,000 each for a total of \$6,000 to attend annual CIFA conference (out-of-state travel)
- 1 staff @ \$1,000 for a total of \$1,000 to attend Legislative CIFA conference (DC)
- 6 staff @ \$500 each for a total of \$3,000 to attend professional training courses & EPA training
- 3 staff @ \$1,000 each for a total of \$3,000 to attend annual SRF Region 3 All States meeting
- 4 staff @ \$500 each for a total of \$2,000 to attend other training (Needs Surveys, CBR/PBR, etc.)

Note 2: Office supplies costs of \$7,375 will be used to purchase computers, peripherals, etc.

Program Income (Non Federal)

The MWQFA charges loan fees equal to 5% of annual debt service, which are used for administrative expenses in addition to the 4% of federal capitalization grant set-aside shown above. The details related to the program income revenue and expenses are provided each year in the annual report. During State FY 2014, MWQFA estimates the fee revenues to be \$3.8 million.

D. Project Scope of Work/Environmental Benefits – FFY 2014 IUP Projects

The following are examples of the type of projects selected for financial assistance in the FFY 2014 IUP. The detailed Environmental Benefits Reporting (EPA one-pager) for each Section 212 project below will also be provided in the annual report to EPA. In addition, Section 319 projects funded through the direct loan program and LD projects will be identified in the one-pagers by specific categories as part of the annual report.

- The City of Salisbury's Salisbury WWTP Biological Nutrient Removal (BNR)/ENR Upgrade Project (Rank 1/85 points) in Wicomico County involves upgrading the existing 8.5 MGD WWTP to ENR treatment levels and constructing other facility improvements. The City of Salisbury is under an amended MDE Consent Order and Judgement to achieve ENR treatment standards for TN and TP and comply with the 2010 NPDES permit by December 31, 2017. Upon completion of the ENR upgrade at this facility, nutrient loads to the Chesapeake Bay will be reduced by 569,247 lbs per year TN and 18,211 lbs per year TP. This project benefits existing sustainable community needs and serves 16,929 homes.
- The City of Frederick's Gas House Pike Wastewater Treatment Plant (WWTP) Enhanced Nutrient Removal (ENR) Upgrade Project (Rank 5/68 points) in Frederick County involves upgrading the existing 8 million gallon per day (MGD) WWTP to ENR treatment levels and constructing other facility improvements. The City of Frederick is under an MDE Consent Order to achieve ENR treatment standards for Total Nitrogen (TN) and Total Phosphorus (TP) in accordance with the City's National Pollutant Discharge Elimination System (NPDES) permit, as based on the Chesapeake Bay Total Maximum Daily Load (TMDL). Upon completion of the ENR upgrade at this facility, nutrient loads to the Chesapeake Bay will be reduced by 121,822 lbs per year TN and 41,420 lbs per year TP. This project implements reuse of treated effluent, benefits existing sustainable community needs and serves 36,288 homes.
- The High Level Sewershed Sewer Improvements (SC-940) Project (Rank 9/65 points) in Baltimore City involves the rehabilitation/replacement of approximately 130,000 linear feet (LF) of cured-in-place pipe lining, 8,300 LF of new pipe, and rehabilitation of 630 manholes. The City is under a Consent Decree to eliminate sanitary sewer overflows (SSOs), as well as to upgrade and rehabilitate its wastewater collection system. The project will prevent SSOs, reduce inflow and infiltration, address capacity problems, and improve the overall condition of the aging sewer system. This project benefits existing sustainable community needs and serves 720,000 homes.
- The Town of Mountain Lake Park's Stormdrain Project-Heritage Dr./Pensinger Blvd. (Rank 70/17 points) in Garrett County involves constructing a new stormwater conveyance system, including various green techniques (i.e., pavement removal/reduction, bioretention areas, grass swales, and removal of roof top drains). This project will improve the quality of stormwater entering the Little Youghiogheny River from a 21.4 acre drainage area. This project benefits existing sustainable community needs.

E. Minority Business Enterprises/Women's Business Enterprises (M/WBE) Participation

The EPA and MDE have negotiated the new fair share goals for FFYs 2013, 2014, and 2015 based on the Maryland Department of Transportation 2011 disparity/availability study, which showed an increase in availability numbers. As a result, the new MDE goals are 17% MBE and 16% WBE for the "construction" category (total 33% M/WBE).

These goals will be applicable to all projects financed using WQSRF (loans, loan-forgiveness/grants). MDE provides WQSRF applicants an "Insert" for inclusion in procurement/bid documents, which outlines the M/WBE (%) goals and the affirmative/positive steps necessary to show a good faith effort consistent with federal regulations under 40 CFR Part 31.36(e). Failure to meet the M/WBE goals does not preclude the use of the SRF, as long as the good faith effort can be demonstrated and documented. It is important that the loan recipients and their prime contractors undertake the necessary affirmative/positive steps to assure that M/WBE firms are afforded the opportunity to participate in SRF projects. M/WBE Program details and forms are available on MDE's web site at www.mde.state.md.us/wqfa.

F. Assurances

The Department agrees to comply with the Federal program requirements as outlined in the Operating Agreement between EPA and MDE dated May 25, 1989 with amendments August 21, 1998, November 15, 2000 and March 18, 2008.

G. Binding Commitments/Federal Payments

The projected binding commitments/federal payment schedule is shown on Table 1.

H. Public Review of the Draft FFY 2014 IUP

Applicants that submitted Financial Assistance Applications were sent an e-mail providing the Draft FFY 2014 IUP project list and informing them on the availability of the Draft IUP/PPL on MDE's website on Friday, May 16, 2014. This Draft FFY 2014 IUP will be the subject of a public hearing on Monday June 16, 2014 at 10:00 AM at the Maryland Department of Environment (Aqua Conference Room, 1st Floor Lobby), 1800 Washington Boulevard, Baltimore, Maryland, 21230. The public hearing record will be closed on June 23, 2014. Comments on the FFY 2014 IUP can be submitted via e-mail, fax, mail and/or in person at the public hearing. Any questions should be directed to Elaine Dietz at 410-537-3908 or at elaine.dietz@maryland.gov. All comments will be included in the responsiveness summary (Appendix C). MDE will respond to those who submitted comments requesting specific actions.